

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

JANE DOE #1, <i>et al.</i> ,)	Case No.: 3:25-cv-00317
)	
<i>Plaintiffs,</i>)	Plaintiffs' Motion for a Protective Order
)	
v.)	
)	
KRISTI NOEM, in her official capacity as Secretary of Homeland Security, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
)	

PLAINTIFFS' MOTION FOR A PROTECTIVE ORDER

Plaintiffs move the Court for a protective order under Federal Rule of Civil Procedure 26(c).

In support of this motion, Plaintiffs state:

1. To facilitate providing Plaintiffs' identities to Defendants, Plaintiffs further move the Court to enter a protective order shielding Plaintiffs' identity, prescribing the manner in which Plaintiffs' information can be used, and enjoining detention and removal during the pendency of the litigation. *See* attached proposed order.

2. Counsel for Plaintiffs conferred with counsel for Defendants by telephone on April 23, 2025, and by email on April 24, 2025. Counsel for Defendants opposes Plaintiffs' motion for pseudonym and motion for a protective order.

3. This motion is accompanied by a brief in support of the motion and proposed order.

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Dated: April 24, 2025

Respectfully submitted,

/s/ Katherine Melloy Goettel

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CERTIFICATE OF SERVICE

I certify that on April 24, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to counsel for Defendants. I also sent a copy of this pleading to the U.S. Attorney's Office by electronic mail.

/s/ Katherine Melloy Goettel

KATHERINE MELLO Y GOETTEL

Counsel for Plaintiffs